

### REMARKS

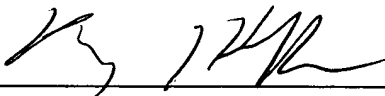
Claims 1-27 are pending in the present application, and claims 19-27 are withdrawn. Claim 16 is cancelled without prejudice. Claims 3-10, 12, 16 and 18 are indicated as allowable and new Claims 28-37 are added by the instant amendment. Applicants appreciate the Examiner's indication of allowable subject matter. Claims 1-2, 13-15 and 17 stand rejected under 35 USC §103 over Hall in view of Hutchins.

United States Patent No. 6,435,804 to Hutchins for "Lifting apparatus" issued August 20, 2002, discloses a lifting apparatus that permits movement between first and second positions in which the first and second positions are at different vertical distances. The lifting apparatus includes a pair of lifting arms at each side of a lifting platform that are driven by an electrical motor or a hydraulic ram. As such, the lifting apparatus moves in vertical directions with no horizontal movement. However, Hutchins fails to provide or suggest for Hall, a first drive assembly that includes a first chain mounted to the frame and a first motor coupled to the first chain, and the second drive assembly that includes a second chain mounted to the frame and a second motor coupled to the second chain, as provided by Applicant's claimed invention.

In view of the foregoing, pending Claims 1-15, 17-18 and 28-37 are in good and proper form for allowance, and the Examiner is respectfully requested to pass this application to issue. If, in the opinion of the Examiner, a telephone conference would expedite the prosecution of the subject application, the Examiner is invited to call the undersigned attorney.

Respectfully submitted,

Dated: 8-26-04

  
\_\_\_\_\_  
Perry J. Hoffman  
Registration No. 37,150  
MICHAEL BEST & FRIEDRICH LLP  
401 North Michigan Avenue, Suite 1900  
Chicago, IL 60611  
(312) 222-6636  
(312) 222-0818 (fax)

Attorney Docket No. 018778-9028  
S:\client\018778\9028\C0416373.1